

# POMERANTZLLP

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November 22, 2022

**VIA ECF**

Hon. Valerie E. Caproni, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 443  
New York, New York 10007

RE: *Collinsville Police Pension Board on behalf of the Collinsville Police Pension Fund*  
*v. Discovery, Inc. et al.*, No. 1:22-cv-08171-VEC

Dear Judge Caproni:

Pomerantz LLP is counsel to Robert Buchwald (“Buchwald”), movant for appointment as Lead Plaintiff in the above-referenced consolidated action (the “Consolidated Action”) pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 77z-1, *et seq.* (the “Lead Plaintiff Motion”). Pursuant to Rule 2.D. of Your Honor’s Individual Practices in Civil Cases, which directs, in relevant part, that “[a]ll proposed orders . . . must be submitted as attachments or exhibits to a letter to the Court filed on ECF explaining the purpose of the proposed order,” we respectfully submit a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Counsel, attached to this letter, in support of Buchwald’s Lead Plaintiff Motion, which must be filed by November 22, 2022, pursuant to the statutory requirements of the PSLRA.

Buchwald’s Lead Plaintiff Motion is based on his satisfaction of the statutory criteria for appointment as Lead Plaintiff pursuant to the PSLRA. *See* 15 U.S.C. § 77z-1(a)(3)(B)(iii)(I). Specifically, Buchwald’s motion was filed by the statutory deadline, Buchwald suffered a substantial loss in connection with the wrongdoing alleged in the Consolidated Action, and Buchwald satisfies the typicality and adequacy requirements of Fed. R. Civ. P. 23. Buchwald has also selected qualified Lead Counsel to represent the class. *See* 15 U.S.C. § 77z-1(a)(3)(B)(v).

Respectfully submitted,



Jeremy A. Lieberman

cc: All counsel of record (via ECF)